To U.S. Environmental Protection Agency (EPA)

Subject: San Jacinto River Waste Pits Superfund Site –Comments on Draft RI Addendum (12/3/13)

Dear Gary,

Thank you for asking the Technical Review Team of Harris County ("Technical Review Team") to review and provide comments on the Draft Remedial Investigation Report Addendum 1 prepared by responsible parties McGinnes Industrial Maintenance Corporation and International Paper Company and their consultant Anchor QEA in connection with the San Jacinto River Waste Pits Superfund Site ("SJRWP" or "Site").

Below are the Technical Review Team's comments:

1) Section 2.2, Page 7, 3rd paragraph: Although the water table depicted in Figure 2-1 may be accurate based on the available data, gauging of an additional well located along the northeast-southwest running road (on the east side) would confirm whether there is a groundwater mound over the area of concern that potentially could allow affected groundwater to travel east.

2) Section 2.3.2, Page 9, Table 2-1: The footnote on Table 2-1 provides a reference on "approximate 24 hour minimum discharge". This discharge should be calculated using TRRP-8 Groundwater Classification guidance. In the guidance, Figure 4, Method 1 provides the equations for an unconfined aquifer to determine the yield from a 12-inch diameter well (used to determine Class 1) and from a 4-inch well (used to determine Class 3). Using the pump test data from the appendix, the sustainable production from well SJMW003 (for a 12-inch well) is over 200,000 gallons per day (this does not change the classification of the GBU, because the TDS is >3000 mg/L).

3) Section 3.2, Page 12, 1st paragraph: There was discussion around the discrepancy between Total and Dissolved TEQ results (total exceeded the PCL while dissolved did not). The statement was made that this was likely due to suspended particulate matter. The field measured turbidity should be presented to back this statement up.

4) Section 4.3, Page 16, 1st paragraph: The report states that the groundwater transport pathway is incomplete. It looks as though the connecting line to groundwater on Figure 4-1 (the Conceptual Site Model) indicates the groundwater pathway is "unknown" (based on the definition given in the figure Legend).

5) Tables, Page 2, Table 3-1: PCBs were not analyzed using a high-resolution congener-specific method, but rather using the Aroclor method. This is problematic since the risk assessment should be done with individual congeners.

6) Section 4.1, Page 14, 1st paragraph: The report states that the RI Report establishes that a dioxin and furan mixture potentially from a third source is present; however, there is no direct reference to the data from which this conclusion was drawn. The reference to the data should be included.